

REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-19 are currently pending. Claims 1, 9, and 11-19 have been amended by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claim 19 was objected to as containing an informality; Claims 11-18 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement; Claims 11-18 were rejected under 35 U.S.C. § 112, second paragraph; Claims 1-19 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter; and Claims 1-19 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,341,287 to Sziklai (hereinafter “the ‘287 patent”).

Applicants respectfully submit that the objection to Claim 19 is rendered moot by the present amendment to Claim 19. Claim 19 has been amended to correct the informality noted in the outstanding Office Action. Accordingly, the objection to Claim 19 is believed to have been overcome.

Applicants respectfully submit that the rejections of Claims 11-18 under 35 U.S.C. § 112, first and second paragraphs, are rendered moot by the present amendment to Claims 11-18. Claim 11 has been amended to clearly recite a plurality of means for interfacing and a means for providing a user interface. Accordingly, the Applicants respectfully submit that the rejections under 35 U.S.C. § 112 are rendered moot.

Applicants respectfully submit that the rejections of the claims under 35 U.S.C. § 101 are rendered moot by the present amendment to the claims. For example, Claim 1 has been amended to be redirected to an integrating document management system for managing

access to documents distributed over a computer network, by providing a plurality of connecting parts that each include an interface that corresponds to a respective one of a plurality of databases, and a common interface that corresponds to the user interface part, such that a plurality of different databases can be managed using the user interface.

Applicants respectfully submit that, as amended, Claim 1 produces a useful, concrete, and tangible result in accordance with the requirements of *State Street Bank*. In particular, Applicants respectfully submit that managing a plurality of different databases using a user interface is a specific, well-defined, substantial, and credible use. Moreover, Claim 1 is directed to a concrete result that is substantially repeatable and a tangible result that sets forth a practical application in producing a real world result, i.e., the management of documents distributed over a computer network in a plurality of different databases.

In this regard, Applicants note that the Office Action on page 6 asks the question “what is the functionality of the data processing parts applied to the integrated document management system?” Applicants respectfully submit that it is not necessary to state with more particularity in Claim 1 what the functionality of the data processing parts are in order for Claim 1 to be directed to statutory subject matter. Rather, it is a combination of the plurality of connecting parts having two types of interfaces that allows a plurality of different databases to be managed using a user interface, as recited in Claim 1. Further, Applicants note that parent Application No. 09/632,212 (now U.S. Patent No. 6,782,387) includes claims reciting limitations analogous to the limitations recited in the currently pending claims. Accordingly, it is unclear to Applicants why the present claims are being rejected under 35 U.S.C. § 101. As discussed above, an integrated document management system that manages documents distributed over a computer network by providing connecting parts having two types of interfaces such that a plurality of different databases can be managed using the user interface is clearly directed to statutory subject matter. Accordingly, for the reasons stated

above, Applicants respectfully submit that the rejection of the claims under 35 U.S.C. § 101 is rendered moot by the present amendment to the claims.

Claim 1 is directed to an integrating document management system for managing access to documents distributed over a computer network, comprising: (1) a plurality of connecting parts configured to interface between a user interface part and a plurality of data processing parts, the connecting parts configured to implement common document management operations upon a plurality of different databases. Further, Claim 1 clarifies that each connecting part includes an interface that corresponds to a respective one of the plurality of databases, and a common interface that corresponds to the user interface part, such that the plurality of different databases can be managed using said user interface. The changes to Claim 1 are supported by the originally filed specification and do not add new matter.

The '287 patent is directed to an integrated system for managing changes in regulatory and non-regulatory requirements for business activities at an industrial or commercial facility. In particular, the '287 patent discloses a system that includes one or more databases that contain information on operations and requirements concerning an activity or area of business, and that the system receives information on regulatory and non-regulatory changes that affect operations of the business, and converts these changes into changes in data entry forms, data processing analysis procedures, and presentation of data processing analysis results, without requiring the services of one of more programmers. In particular, as recited in Claim 1 of the '287 patent, the '287 patent discloses a plurality of databases including a first database that provides product stewardship, a second database that allows tracking and prevention of selected incidents, a third database that provides information on monitoring of personnel health and safety, and a fourth database that provides information on and monitoring of hazardous materials, etc. Further, the '287 patent discloses that the system includes a tools module that provides software for at least one of creation of a

report on operations at the facility or creation of at least one image for a report on operations, and a relational database management module that links each database to each other database and to the tools module so that an information item, once entered, becomes available to each database and to the tools module.¹ Further, as shown in Figure 1, the '287 patent discloses four layers that comprise the primary components of the invention, including the change layer 11, the Java data management layer 13, the metadata layer 15, and the business content layer 17.

However, Applicants respectfully submit that the '287 patent fails to disclose a plurality of connecting parts configured to interface between a user interface part and a plurality of data processing parts, wherein each connecting part includes (1) an interface that corresponds to a respective one of the plurality of databases, and (2) a common interface that corresponds to the user interface part, as recited in Claim 1. Rather, the '287 patent merely discloses a plurality of databases in a user management unit that manages changes to the data contained in the plurality of databases. However, Applicants respectfully submit that the '287 patent fails to disclose a plurality of connecting parts, wherein each connecting part includes two elements: (1) an interface that corresponds to a respective database, and (2) a common interface that corresponds to a user interface part.

In this regard, Applicants note that page 9 of the outstanding Office Action cites to columns 11, 15, and 29, as well as Figures 8-17 of the '287 patent as disclosing this limitation. However, Applicants note that column 15, lines 48-51, cited by the Office Action, states that "a user located in a remote site, connected by telephone or through the Internet, can provide input information for a company system using the Java data management layer." However, Applicants respectfully submit that this section of the '287 patent is unrelated to a plurality of connecting parts wherein each connecting part includes an interface that

¹ See columns 32-34 of the '287 patent.

corresponds to a respective one of the plurality of databases and a common interface that corresponds to the user interface part, as recited in Claim 1. Similarly, column 29, lines 19-30, cited by the Office Action, discloses a *server* that provides one or more databases of information and provides substantially all the analysis and processing capability for this information. In particular, the '287 patent discloses that the server helps a user to build one or more queries that present a request to the databases in a form the databases can respond to provide all the information the user has requested. However, Applicants respectfully request that this is not a disclosure of a plurality of connecting parts configured to interface between a user interface part and a plurality of processing parts, wherein each connecting part includes an interface that corresponds to a respective one of the plurality of databases and a common interface that corresponds to the user interface part, as recited in Claim 1. Rather, the passage is merely directed to a server. The '287 patent does not teach or suggest a plurality of connecting parts corresponding to plurality of databases, each of the plurality of connecting parts including two different interfaces, as recited in Claim 1. Similarly, column 11, lines 2-7 of the '287 patent merely discloses an integrated user interface with all the functions necessary for managing business data, but does not disclose that plurality of connecting parts each having two interfaces, as recited in Claim 1.

Further, column 11, lines 56-67 of the '287 patent discloses the use of a standard interface along with metadata that describes the various system components using a business-like terminology. Further, this section discloses that the main components of the interface portion of the invention are a web server, a database server, and a Java-enabled browser. However, again, Applicants respectfully submit that this is not a disclosure of a plurality of connecting parts each including two interfaces, as recited in Claim 1.

Further, at column 15, lines 60-65 of the '287 patent discloses that the Java data management layer and the metadata layer together serve as a standard interface system that is

positioned “on top of” one or more databases, allowing addition, deletion, and modification of data entry forms, tables, views, images, reports, queries, and information processing and logic. However, Applicants respectfully submit that this is not a disclosure of a plurality of connecting parts, each including the two interfaces recited in Claim 1. In addition, Applicants respectfully submit that Figures 8-17 merely shows a user interface to the databases, which does not disclose the plurality of connecting parts each including the two interfaces recited in Claim 1.

Accordingly, for the reasons stated above, Applicants respectfully traverse the rejection of Claim 1 (and all associated dependent claims) as anticipated by the ‘287 patent.

Independent Claims 9 and 11 recite limitations analogous to the limitations recited in Claim 1. Accordingly, for reasons analogous to the reasons stated above for the patentability of Claim 1, Applicants respectfully traverse the rejections of Claims 9 and 11 (and all associated dependent claims) as anticipated by the ‘287 patent.

Thus, it is respectfully submitted that independent Claims 1, 9, and 11 (and all associated dependent claims) patentably define over the ‘287 patent.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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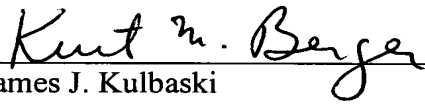
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